UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

UNITED STATES OF AMERICA,	
Civiled Strites of America,)
Plaintiff,)
) Case No. 4:11-CV-00077-RWS
v.)
) Judge Rodney W. Sippel
AMEREN MISSOURI,)
)
Defendant.)
)

AMEREN MISSOURI'S MOTION TO COMPEL 30(b)(6) TESTIMONY ON EPA'S 2003 RULE REGARDING "RMRR"

For the reasons set forth more fully in the accompanying memorandum in support, Defendant Ameren Missouri ("Ameren"), by its attorneys, respectfully moves to compel 30(b)(6) testimony on EPA's 2003 rule regarding "routine maintenance, repair, and replacement."

Pursuant to Local Rule 3.04, Ameren's counsel has conferred in good faith with the United States' counsel regarding testimony on the aforementioned rule on March 10, 2014, March 11, 2014, and March 12, 2014. Despite the parties' sincere efforts to resolve this issue, counsel were unable to reach an accord.

WHEREFORE, Ameren respectfully requests that the Court grant this motion and order the relief requested herein.

Dated: March 18, 2014 Respectfully submitted,

/s/ Matthew B. Mock

Ronald S. Safer (*pro hac vice*)
Patricia Brown Holmes (*pro hac vice*)
Renee Cipriano (*pro hac vice*)
Steven J. Bonebrake (*pro hac vice*)
Matthew B. Mock (*pro hac vice*)

Schiff Hardin LLP

233 South Wacker Drive Suite 6600 Chicago, Illinois 60606

Phone: (312) 258-5500 Fax: (312) 258-5600

James J. Virtel Armstrong Teasdale LLP 7700 Forsyth Boulevard Suite 1800 St. Louis, Missouri 63105 Phone: (314) 621-5070

Fax: (314) 612-2298

jvirtel@armstrongteasdale.com

Counsel for Defendant Ameren Missouri

CERTIFICATE OF SERVICE

I hereby certify that on March 18, 2014, I electronically filed the foregoing Ameren Missouri's Motion to Compel 30(b)(6) Testimony on EPA's 2003 Rule Regarding "RMRR" with the Clerk of Court using the CM/ECF system, which will cause an electronic copy to be served on counsel of record, who are listed below:

Justin A. Savage
Andrew C. Hanson
Bradford T. McLane
Nigel Cooney
Environmental Enforcement Section
Environment and Natural Resources Division
U.S. Department of Justice
P.O. Box 7611
Washington, DC 20044-7611
Telephone: (202) 514-5293

Telephone: (202) 514-5293 Facsimile: (202) 514-0097

/s/ Matthew B. Mock